

# **EXHIBIT O**



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September 25, 2024

Ross M. Good, Esq.  
The Good Law Group  
800 E. Northwest Hwy, Suite 814  
Palatine, IL 60074

via email to [ross@thgoodlawgroup.com](mailto:ross@thgoodlawgroup.com) and  
via overnight mail

RE: **Whiteamire Clinic P.A., Inc. v. Cartridge World North America, LLC**  
**Case No. 1:24-cv-06753**  
**Response to Third Party Citation to Discover Assets - Horizon Ink L.C.**

Dear Mr. Good,

Please be advised that our firm represents Horizon Ink L.C. I am writing in response to your subpoena (Third Party Citation to Discover Assets) dated August 20, 2024.

I respectfully contest and object to the Third Party Citation to Discover Assets and my client's appearance in this matter for the following reasons:

1. **Lack of personal jurisdiction.** Horizon Ink L.C. is not a resident and has no substantial ties to Illinois as it does not conduct business, own property or have other significant connections with the State of Illinois in a manner that would subject it to the jurisdiction of its courts.
2. **Irrelevant information.** The subpoena seeks information and documents that are not and have never been in its possession, custody, or control. Horizon Ink L.C. does not possess any relevant information that pertains to the subject matter as set forth in the Subpoena or the litigation in question.
3. **Undue burden and expense.** Complying with this Subpoena to appear in person would impose an undue burden, including costs of travel and preparation without any relevance to the case. The requesting party has not demonstrated why such a burden should be imposed on a Michigan company with no connection to this matter.

Without waiving the above objections, Horizon Ink L.C. answers the Subpoena as follows:

1. Horizon Ink L.C. has no shared assets of any type with Cartridge World North America, L.L.C.
2. Horizon Ink L.C. does not have, possess, or control any of the documents requested.
3. Horizon Ink L.C. does not have a franchise agreement with Cartridge World North America, L.L.C.
4. To the best of Horizon Ink L.C.'s knowledge, Cartridge World North America L.L.C. was dissolved over five (5) years ago.

I, MATT TATE, member/manager of HORIZON INK L.C., have read the foregoing and assert that the contents thereof are true and correct to the best of my knowledge, information, and belief.

Dated: 9/25/2024

Signed:   
HORIZON INK L.C.  
BY: MATT TATE, Member/Manager

Sincerely,

STURTZ & STURTZ, P.C.



PHILIP A. STURTZ

PAS:jg